IN THE UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF TEXAS CORPUS CHRISTI DIVISION

IN RE: Cornelius, Joshua CASE NO: 17-20168

CHAPTER 13

DEBTOR(S)

RESPONSE TO CHAPTER 13 TRUSTEE'S MOTION TO DISMISS CASE AND REQUEST FOR HEARING

(THIS MOTION RESPONDS TO DOCKET NO. 28)

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

NOW COMES, Joshua Cornelius ("Debtors"), in the above captioned

Chapter 13 bankruptcy case, and filed this Response to the Chapter 13 Trustee's Motion to

Dismiss and Request for Hearing, the "Motion" and would show as follows.

Debtors will make the payments or file the necessary amendments to satisfy the requests of the Chapter 13 Trustee. The Debtors request that a hearing be held in connection with this matter.

WHEREFORE, Debtor(s) pray that after hearing this matter, the Court deny the Chapter 13 Trustee's Motion to Dismiss and grant Debtors any all relief to which the Debtor(s) may justly be entitled.

Respectfully Submitted:

/s/ ADELITA CAVADA

SBOT 24084882 The Perez Law Firm 4646 Corona, Suite 165 Corpus Christi, TX 78411 Phone: (361) 814-6500 Fax (361) 814-8618

CERTIFICATE OF SERVICE

I hereby certify that on May 23, 2017, a true and correct copy of the foregoing was served by first class mail, postage prepaid on the Debtor(s), the U. S. Trustee, and the Chapter 13 Trustee, and to all Creditors and interested parties shown below or on any attached list, unless party otherwise receives electronic notice of the filing from the Clerk of the Court.

Date:May 23, 2017 /S/ Adelita Cavada